



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 W. Ocean Boulevard, 4th Floor

Long Beach, CA 90802

(562) 570-5237

FAX (562) 570-8205

July 6, 2011

Mark Persico, AICP
Director of Development Services
City of Seal Beach
211 8th Street
Seal Beach, CA 90740

City of Seal Beach

JUL - 6 2011

Department of
Development Services

RE: NOP/IS for the Department of Water and Power Specific Plan Amendment

Dear Mr. Persico:

The City of Long Beach appreciates the opportunity to review and comment on the Notice of Preparation / Initial Study for the proposed Amendment to the Department of Water and Power (DWP) Specific Plan. The City submits the following comments for consideration:

4.1 AESTHETICS

The Draft EIR should analyze the proposed design and merits of the subdivision for the project. Section 2.3.1 of the Initial Study lists the project objectives, including "To design and build a residential neighborhood that extends the existing urban form of the Old Town Neighborhood by replicating street layout, lot patterns and building forms." Neither the proposed layout of the streets and alleys nor an identical lot width for all 48 residential lots in the subdivision satisfies the objective of extending the urban form of the Old Town Neighborhood. The proposed circulation pattern and lack of differentiation in lot widths are both issues that were raised by Seal Beach residents at the scoping meeting that was held on June 20, 2011. The proposed design of the subdivision will also result in a nondescript, unattractive corner at the intersection of Marina Drive and 1st Street.

4.10 LAND USE AND PLANNING

The Draft EIR should carefully analyze the impacts of the proposed project's required amendments to the City of Seal Beach's planning documents. The General Plan, the DWP Specific Plan, the Redevelopment Plan and the Zoning Code must all be amended in order to facilitate the development of the project site into a 48-lot subdivision for custom, single-family homes.

When the DWP Specific Plan was revised in 1996, the unique location of the project site received substantial consideration. The current land use designations for the project site,

described as "Visitor-Serving Uses" in the text of the Land Use Element and the 1996 DWP Specific Plan, and "Service Commercial" in the Zoning Code, were determined to be the appropriate and preferable designations for acreage located adjacent to a public bicycle path and the San Gabriel River and near to the Pacific Ocean. The current land use designations are also compatible with the existing land uses on the opposite side of the San Gabriel River in the City of Long Beach.

4.16 TRAFFIC AND CIRCULATION

The Draft EIR should analyze the proposed street and alley configurations and resulting circulation impacts of the proposed project. As designed, the location of Alley "B", in particular, could result in an unsafe egress on to 1st Street. The location of Alley "C" could also result in an unsafe egress on to Marina Drive.

DRAFT EIR ALTERNATIVES

The Draft EIR should include an alternative that considers a hotel development in accordance with the current Specific Plan and the existing land use designations in the General Plan and Zoning Code, "Visitor-Serving Uses" and "Service Commercial", respectively. The City of Seal Beach should consider having an expanded analysis for this alternative in the Draft EIR. While this visitor-serving alternative would not satisfy the two project objectives that specify a residential development, the expanded analysis of this alternative would provide the decision-makers with a greater amount of information for comparison purposes to the proposed project.

Four of Seal Beach's land use documents, the General Plan, the DWP Specific Plan, the Redevelopment Plan and the Zoning Code, must be amended in order for the proposed project to be developed. Full disclosure of the potential impacts of a development under the current regulations will be beneficial for those individuals who are being asked to assess and vote on the merits and impacts of the proposed project.

We wish to thank you for the opportunity to review the Initial Study for the proposed DWP Specific Plan Amendment and we look forward to the release of the Draft Environmental Impact Report. If there are questions regarding our comments, please contact Jill Griffiths, AICP at (562) 570-6191.

Sincerely,



AMY J. BODEK, AICP
DIRECTOR

AJB:JG